

Timothy W. Burns (admitted *pro hac vice*)
WI Bar 1068086
Jesse J. Bair (admitted *pro hac vice*)
WI Bar 1083779
BURNS BAIR LLP
10 East Doty Street, Suite 600
Madison, WI 53703
Telephone: (608) 286-2302
Email: tburns@burnsbair.com
jbair@burnsbair.com

*Special Insurance Counsel to
The Official Committee of Unsecured Creditors*

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re
THE ROMAN CATHOLIC ARCHBISHOP
OF SAN FRANCISCO,
Debtor and Debtor in Possession.

Case No. 23-30564

Chapter 11

**MONTHLY PROFESSIONAL FEE
STATEMENT FOR BURNS BAIR LLP
FOR MAY 2025**

TO ALL INTERESTED PARTIES AND TO THEIR COUNSEL OF RECORD:

NOTICE IS HEREBY GIVEN that Burns Bair LLP, special insurance counsel to the Official Committee of Unsecured Creditors (the “Committee”), hereby files its monthly professional fee statement for the period May 1, 2025 through May 31, 2025 (the “Fee Period”), pursuant to the *Order Establishing Procedures and Authorizing Payment of Professional Fees and Expenses on a Monthly Basis* (the “Compensation Order”), entered on October 16, 2023 [ECF No. 212]. The total fees and expenses incurred by Burns Bair LLP on behalf of the Committee for the Fee Period are as follows:

Period	Fees	Expenses	Total
May 1, 2025 through May 31, 2025	\$18,279.00 ¹	\$1.29	\$18,280.29
Net Total Allowed Payments this Statement Period (80% of fees and 100% of expenses)	\$14,623.20	\$1.29	\$14,624.49

¹ Burns Bair will contribute ten percent of all fees it receives in this case on a final basis to a settlement trust that is approved as part of a plan of reorganization. As such fees are paid, Burns Bair will hold those funds in a trust account until a settlement trust is established through a plan of reorganization.

Attached hereto at **Exhibit 1** is Burns Bair's itemized billing statement for its fees and expenses billed during the Fee Period. Pursuant to the Compensation Order, the Net Total Allowed Payments detailed in the chart above shall be paid from funds held by the estate of the Debtor, The Roman Catholic Archbishop of San Francisco, unless an objection is filed with the Clerk of the Court and served upon Burns Bair LLP within *14 days after the date of service* of this monthly professional fee statement.

Dated: June 30, 2025

BURNS BAIR LLP

By: /s/ Jesse J. Bair
Jesse J. Bair

*Special Insurance Counsel to the Official
Committee of Unsecured Creditors*

EXHIBIT 1

Burns | Bair

10 E. Doty St., Suite 600
Madison, Wisconsin 53703-3392
608-286-2302
www.BurnsBair.com

Official Committee of Unsecured Creditors of
Archbishop of San Francisco

Issue Date : 6/19/2025
Bill # : 01962

Matter: Insurance

PROFESSIONAL SERVICES RENDERED

Committee Meetings

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
5/8/2025	Brian Cawley	Participate in Committee meeting for insurance purposes re case developments and next-steps (1.0); participate in post-meeting call with Committee professionals re pre-petition debtor CVA settlements (.2);	1.20	\$660.00
5/8/2025	Jesse Bair	Review agenda and prepare for Committee meeting (.1); participate in Committee meeting for insurance purposes re case developments and next-steps (1.0);	1.10	\$990.00
5/22/2025	Brian Cawley	Participate in committee meeting for insurance purposes re case developments and next-steps (1.0);	1.00	\$550.00
5/22/2025	Jesse Bair	Review agenda for Committee meeting (.1); participate in Committee meeting for insurance purposes re various case developments, strategy, and next-steps (1.0);	1.10	\$990.00
Totals for Committee Meetings			4.40	\$3,190.00

Fee Applications

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
5/9/2025	Jesse Bair	Review and respond to correspondence with the debtor, fee examiner, and Committee professionals re next round of interim fee applications (.1);	0.10	\$90.00
5/20/2025	Jesse Bair	Correspond with G. Brown re monthly fee statement (.1);	0.10	\$90.00

5/27/2025	Brenda Horn-Edwards	Draft monthly fee statement and certificate of service (.2); correspond with J. Bair re same (.1);	0.30	\$102.00
5/27/2025	Brenda Horn-Edwards	File and serve monthly fee statement (.2);	0.20	\$68.00
5/27/2025	Jesse Bair	Review and edit monthly fee statement and correspond with B. Horn-Edwards re same (.1);	0.10	\$90.00
Totals for Fee Applications		0.80	\$440.00	

Insurance Recovery Activities

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
5/1/2025	Timothy Burns	Review and respond to correspondence with PSZJ and the debtor re exchange of claims data for mediation (.2); review and respond to correspondence with Committee professionals and mediators re mediation (.2);	0.40	\$448.00
5/1/2025	Jesse Bair	Participate in portion of meet and confer with the debtor re claim reconciliation process (.5); participate in post-meeting call with B. Michael re outcome of same and next-steps (.2);	0.70	\$630.00
5/1/2025	Brian Cawley	Respond to J. Bair request regarding claimant data list (.2);	0.20	\$110.00
5/5/2025	Jesse Bair	Participate in call with T. Burns re case insurance strategy and next-steps re same (.2);	0.20	\$180.00
5/5/2025	Timothy Burns	Participate in conference with J. Bair re insurance strategy and case developments (.2);	0.20	\$224.00
5/6/2025	Timothy Burns	Review PSZJ case update memo (.1);	0.10	\$112.00
5/6/2025	Jesse Bair	Review correspondence with B. Michael and state court counsel re case developments and next-steps (.1);	0.10	\$90.00
5/7/2025	Jesse Bair	Review memorandum and correspondence from state court counsel re allocation of fault issues in connection with opposing the debtor's request for stay protection for non-debtor related entities (.2);	0.20	\$180.00
5/7/2025	Jesse Bair	Correspond with B. Michael and the mediator's office re next mediation session (.1);	0.10	\$90.00
5/7/2025	Jesse Bair	Further analysis re carrier claim count issues in connection with claim reconciliation project with debtor (.1);	0.10	\$90.00
5/7/2025	Timothy Burns	Review case update correspondence from PSZJ to the Committee (.1);	0.10	\$112.00

5/8/2025	Jesse Bair	Participate in call with PSZJ re prior CVA settlement data and related insurance issues (.2); follow-up correspondence with PSZJ re same (.1);	0.30	\$270.00
5/8/2025	Jesse Bair	Review additional correspondence with the debtor and Committee professional re claims reconciliation project (.1);	0.10	\$90.00
5/8/2025	Jesse Bair	Review and respond to correspondence with Committee professionals re insurer intervention in adversary proceeding (.1);	0.10	\$90.00
5/8/2025	Brian Cawley	Respond to J. Bair request regarding claim information (.2);	0.20	\$110.00
5/8/2025	Timothy Burns	Review and respond to correspondence with Committee professionals re intervention issues re adversary proceeding (.2);	0.20	\$224.00
5/8/2025	Timothy Burns	Review correspondence with Committee professionals and the mediators re upcoming mediation session (.2);	0.20	\$224.00
5/9/2025	Jesse Bair	Review settlement documents re prior debtor and insurer CVA settlement (.2); correspond with PSZJ re same (.1); participate in call with the debtor re same and related productions needed (.2); participate in conference with T. Burns re same (.1);	0.60	\$540.00
5/9/2025	Timothy Burns	Review pre-petition settlement materials and related correspondence among Committee professionals re same (.4); conference with J. Bair re same (.1);	0.50	\$560.00
5/9/2025	Timothy Burns	Participate in call with state court counsel re stay adversary proceeding (.2); prepare memo to team re legal issues about insurance impact in connection with same (.2);	0.40	\$448.00
5/15/2025	Timothy Burns	Review and respond to correspondence with the debtor re insurance meeting (.1);	0.10	\$112.00
5/15/2025	Timothy Burns	Prepare for meet and confer with the debtor re various case insurance issues (.2); participate in meet and confer with the debtor re same (1.0); participate in call with J. Bair re outcome of meet and confer and next-step re same (.2);	1.40	\$1,568.00
5/15/2025	Jesse Bair	Prepare for insurance meet and confer with the debtor (.1); participate in meet and confer with the Debtor re various case insurance issues (1.0); participate in call with T. Burns re outcome of meet and confer and insurance next-steps (.2);	1.30	\$1,170.00
5/20/2025	Timothy Burns	Review BB internal correspondence re mediation issues (.1);	0.10	\$112.00

5/20/2025	Timothy Burns	Prepare for mediation session (.1); participate in portion of Zoom mediation session for insurance purposes (2.3); conference with J. Bair re mediation outcome and next-steps (.1);	2.50	\$2,800.00
5/20/2025	Brian Cawley	Begin drafting motion for comfort order re sending insurance demand letters (1.3);	1.30	\$715.00
5/20/2025	Jesse Bair	Prepare for mediation (.1); participate in portion of Zoom mediation session for insurance purposes (2.2); participate in conference with T. Burns re mediation session outcome and next-steps (.1);	2.40	\$2,160.00
5/21/2025	Jesse Bair	Review correspondence with the mediators re follow-up insurance discussion (.1);	0.10	\$90.00
5/22/2025	Timothy Burns	Begin preparing for June mediation session (.3);	0.30	\$336.00
5/22/2025	Jesse Bair	Begin preparing for upcoming insurance mediation meeting (.2);	0.20	\$180.00
5/23/2025	Timothy Burns	Participate in call with state court counsel re mediation issues (.1);	0.10	\$112.00
5/27/2025	Timothy Burns	Review debtor's letter to Judge Montali re discovery dispute with the Committee (.1);	0.10	\$112.00
5/28/2025	Jesse Bair	Review motion to compel order and related correspondence with the Committee (.1);	0.10	\$90.00
5/31/2025	Jesse Bair	Brief review re the Debtor's preliminary injunction motion and correspond with PSZJ re call to discuss insurance issues in connection with same (.2); correspond with B. Cawley re mediator's insurance requests (.1);	0.30	\$270.00
Totals for Insurance Recovery Activities			15.30	\$14,649.00

Total Hours and Fees	20.50	\$18,279.00
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EXPENSES

<u>Date</u>	<u>Description</u>	<u>Amount</u>
05/27/2025	Postage	\$1.29
Total Expenses		\$1.29

Timekeeper Summary

<u>Name</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Brenda Horn-Edwards	Paralegal	0.50	\$340.00	\$170.00
Brian Cawley	Associate	3.90	\$550.00	\$2,145.00
Jesse Bair	Partner	9.40	\$900.00	\$8,460.00
Timothy Burns	Partner	6.70	\$1,120.00	\$7,504.00

Total Due This Invoice: \$18,280.29

1 Timothy W. Burns (admitted *pro hac vice*)
WI Bar 1068086
2 Jesse J. Bair (admitted *pro hac vice*)
WI Bar 1083779
3 BURNS BAIR LLP
4 10 East Doty Street, Suite 600
Madison, WI 53703
5 Telephone: (608) 286-2302
Email: tburns@burnsbair.com
6 jbair@burnsbair.com

*Special Insurance Counsel to
The Official Committee of Unsecured Creditors*

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

11 In re
12 THE ROMAN CATHOLIC ARCHBISHOP
13 OF SAN FRANCISCO,
14 Debtor and Debtor in Possession.

Case No. 23-30564

Chapter 11

CERTIFICATE OF SERVICE

I, Brenda Horn-Edwards, declare that I am employed in the County of Dane, State of Wisconsin. I am over the age of 18 and not a party to the within action. My business address is E. Doty Street, Suite 600, Madison, Wisconsin 53703.

On June 30, 2025, I served a true and correct copy of the **Monthly Professional Fee Statement for Burns Bair LLP for May 2025** in the manner stated below:

21
22
23 TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to
controlling General Orders and LBR, the foregoing document was served by the court via NEF and
hyperlink to the document. On **June 30, 2025**, I checked the CM/ECF docket for this bankruptcy
case or adversary proceeding and determined that the participants on the attached Electronic Mail
Notice List will receive NEF transmission at the email address stated.

1	(BY MAIL) I am readily familiar with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid in Dane County, Wisconsin, in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.
2	<p>The Honorable Dennis Montali United States Bankruptcy Court Northern District of California 450 Golden Gate Avenue, 16th Floor San Francisco, CA 94102</p>
3	<p><input checked="" type="checkbox"/> (BY EMAIL) I caused to be served the above-described document by email to the parties indicated on the attached Service List at the email address stated.</p>

I declare, under penalty of perjury, that the foregoing is true and correct. Executed on June 30, 2025, at Madison, Wisconsin.

/s/ Brenda Horn-Edwards
Brenda Horn-Edwards

ELECTRONIC MAIL NOTICE LIST

Mary Alexander on behalf of Creditor Daniel Eichhorn
malexander@maryalexanderlaw.com

Darren Azman on behalf of Interested Party Sacred Heart Cathedral Preparatory
dazman@mwe.com, mco@mwe.com

Jesse Bair on behalf of Creditor Committee The Official Committee of Unsecured Creditors
jbair@burnsbair.com, kdempski@burnsbair.com

Hagop T. Bedoyan on behalf of Interested Party The Roman Catholic Bishop of Fresno
hagop.bedoyan@mccormickbarstow.com, ecf@kleinlaw.com

Jason Blumberg on behalf of U.S. Trustee Office of the U.S. Trustee / SF
jason.blumberg@usdoj.gov, ustpregion17.sf.ecf@usdoj.gov

Gillian Nicole Brown on behalf of Creditor Committee The Official Committee of Unsecured Creditors
gbrown@pszjlaw.com

John Bucheit on behalf of Interested Party Appalachian Insurance Company
jbucheit@phrd.com

Timothy W. Burns on behalf of Creditor Committee The Official Committee of Unsecured Creditors
tburns@burnsbair.com, kdempski@burnsbair.com

George Calhoun on behalf of Interested Party Century Indemnity Company
george@ifrahlaw.com

Peter C. Califano on behalf of Creditor The Roman Catholic Seminary of San Francisco
pcalifano@nvlawllp.com

Brian P. Cawley on behalf of Creditor Committee The Official Committee of Unsecured Creditors
bcawley@burnsbair.com

Robert M Charles, Jr on behalf of Interested Party Parishes of the Roman Catholic Archdiocese of San Francisco
rcharles@lewisroca.com

Jason Chorley on behalf of Interested Party Century Indemnity Company
jason.chorley@clydeco.us, Robert.willis@clydeco.us

Amanda L. Cottrell on behalf of Debtor The Roman Catholic Archbishop of San Francisco
acottrell@sheppardmullin.com, JHerschap@sheppardmullin.com

Jennifer Witherell Crastz on behalf of Creditor City National Bank
jcrastz@hemar-rousso.com

Blaise S Curet on behalf of Interested Party Westport Insurance Corporation f/k/a Employers Reinsurance Corporation
bcuret@spcclaw.com

Melissa M DAlelio on behalf of Interested Party Appalachian Insurance Company
mdalelio@robinskaplan.com

Jared A. Day on behalf of U.S. Trustee Office of the U.S. Trustee / SF
jared.a.day@usdoj.gov

Michele Nicole Detherage on behalf of Interested Party Appalachian Insurance Company
mdetherage@robinskaplan.com

Allan B Diamond on behalf of Interested Party The Archdiocese of San Francisco Capital Asset Support Corporation
adiamond@diamondmccarthy.com

Luke N. Eaton on behalf of Interested Party Companhia De Seguros Fidelidade SA (fka Fidelidade Insurance Company of Lisbon)
lukeeaton@cozen.com, monugiac@pepperlaw.com

Michael W Ellison on behalf of Interested Party First State Insurance Company
mellison@sehlaw.com

Stephen John Estey on behalf of Interested Party Dennis Fruzza
steve@estey-bomberger.com

Timothy W. Evanston on behalf of Interested Party Certain Underwriters at Lloyds London and Certain London Market Companies
tevanston@skarzynski.com

Trevor Ross Fehr on behalf of U.S. Trustee Office of the U.S. Trustee / SF
trevor.fehr@usdoj.gov

Robert David Gallo on behalf of Interested Party Appalachian Insurance Company
dgallo@phrd.com

Debra I. Grassgreen on behalf of Creditor Committee The Official Committee of Unsecured Creditors
dgrassgreen@pszjlaw.com, hphan@pszjlaw.com

Gail S. Greenwood on behalf of Creditor Committee The Official Committee of Unsecured Creditors
ggreenwood@pszjlaw.com, rrosales@pszjlaw.com

John Grossbart on behalf of Interested Party Appalachian Insurance Company
john.grossbart@dentons.com

John Grossbart on behalf of Interested Party St. Paul Fire and Marine Insurance Co.
docket.general.lit.chi@dentons.com

Joshua K Haevernick on behalf of Interested Party St. Paul Fire and Marine Insurance Co.
joshua.haevernick@dentons.com

Robert G. Harris on behalf of Creditor Archbishop Riordan High School
rob@bindermalter.com, RobertW@BinderMalter.com

Deanna K. Hazelton on behalf of U.S. Trustee Office of the U.S. Trustee / SF
deanna.k.hazelton@usdoj.gov

Jordan Anthony Hess on behalf of Interested Party Century Indemnity Company
jhess@plevinturner.com

Todd C. Jacobs on behalf of Interested Party Appalachian Insurance Company
tjacobs@phrd.com

Daniel James on behalf of Interested Party Certain Underwriters at Lloyds London and Certain London Market Companies
daniel.james@clydeco.us

Christopher D. Johnson on behalf of Interested Party The Archdiocese of San Francisco Capital Asset Support Corporation
chris.johnson@diamondmccarthy.com

Jeff D. Kahane on behalf of Interested Party Certain Underwriters at Lloyds London and Certain London Market Companies
jkahane@skarzynski.com

Taylor Karpa Schollard on behalf of Interested Party Appalachian Insurance Company
tkarpa@robinskaplan.com

Ori Katz on behalf of Debtor The Roman Catholic Archbishop of San Francisco
okatz@sheppardmullin.com, LSegura@sheppardmullin.com

Jeannie Kim on behalf of Debtor The Roman Catholic Archbishop of San Francisco
jekim@sheppardmullin.com, dgatmen@sheppardmullin.com

David S. Kupetz on behalf of Interested Party Daughters of Charity Foundation
David.Kupetz@lockelord.com, Mylene.Ruiz@lockelord.com

Jennifer R Liakos on behalf of Interested Party LL John Doe JU
jenn@jennliakoslaw.com

Christina Marie Lincoln on behalf of Interested Party Appalachian Insurance Company
clincoln@robinskaplan.com

Lisa Arlyn Linsky on behalf of Interested Party Sacred Heart Cathedral Preparatory
llinsky@mwe.com

John William Lucas on behalf of Creditor Committee The Official Committee of Unsecured Creditors
jlucas@pszjlaw.com, ocarpio@pszjlaw.com

Alan H. Martin on behalf of Debtor The Roman Catholic Archbishop of San Francisco
AMartin@sheppardmullin.com, lwidawskyleibovici@sheppardmullin.com

Patrick Maxcy on behalf of Interested Party Appalachian Insurance Company
patrick.maxcy@dentons.com, docket.general.lit.chi@dentons.com

Patrick Maxcy on behalf of Interested Party St. Paul Fire and Marine Insurance Co.
docket.general.lit.chi@dentons.com

Brittany Mitchell Michael on behalf of Creditor Committee The Official Committee of Unsecured Creditors
bmichael@pszjlaw.com

M. Keith Moskowitz on behalf of Interested Party Appalachian Insurance Company
keith.moskowitz@dentons.com

Michael Norton on behalf of Interested Party Certain Underwriters at Lloyds London and Certain London Market Companies
michael.norton@clydeco.us, nancy.lima@clydeco.us

Office of the U.S. Trustee / SF
USTPRegion17.SF. ECF@usdoj.gov

Paul J. Pascuzzi on behalf of Debtor The Roman Catholic Archbishop of San Francisco
ppascuzzi@ffwplaw.com, docket@ffwplaw.com

Valerie Bantner Peo on behalf of Interested Party Berkeley Research Group, LLC
vbantnerpeo@buchalter.com

Robert J. Pfister on behalf of Creditor Shajana Steele
rpfister@pslawllp.com

Mark D. Plevin on behalf of Interested Party Continental Casualty Company
mplevin@crowell.com, mark-plevin-crowell-moring-8073@ecf.pacerpro.com

Gregory S. Powell on behalf of U.S. Trustee Office of the U.S. Trustee / SF
greg.powell@usdoj.gov, Tina.L.Spyksma@usdoj.gov

Douglas B. Provencher on behalf of Other Prof. Douglas B. Provencher
dbp@provlaw.com

Nathan W. Reinhardt on behalf of Interested Party Certain Underwriters at Lloyds London and Certain London Market Companies
nreinhardt@skarzynski.com

Jason E. Rios on behalf of Debtor The Roman Catholic Archbishop of San Francisco
jrios@ffwplaw.com, docket@ffwplaw.com

Kathleen Mary Derrig Rios on behalf of Interested Party Parishes of the Roman Catholic Archdiocese of San Francisco
kderrig@lewisroca.com

Matthew Roberts on behalf of Interested Party Appalachian Insurance Company
mroberts@phrd.com

Annette Rolain on behalf of Interested Party First State Insurance Company
arolain@rugerilaw.com

Cheryl C. Rouse on behalf of Creditor Victoria Castro
rblaw@ix.netcom.com

Samantha Ruben on behalf of Interested Party St. Paul Fire and Marine Insurance Co.
samantha.ruben@dentons.com

Phillip John Shine on behalf of U.S. Trustee Office of the U.S. Trustee / SF
phillip.shine@usdoj.gov

James I. Stang on behalf of Creditor Committee The Official Committee of Unsecured Creditors
jstang@pszjlaw.com

Ashley Storey on behalf of Interested Party Certain Underwriters at Lloyds London and Certain London Market Companies
astorey@skarzynski.com

Devin Miles Storey on behalf of Creditor John MS Roe SF
dms@zalkin.com

Jason D. Strabo on behalf of Interested Party Sacred Heart Cathedral Preparatory
jstrabo@mwe.com

Catalina Sugayan on behalf of Interested Party Certain Underwriters at Lloyds London and Certain London Market Companies
catalina.sugayan@clydeco.us, Nancy.Lima@clydeco.us

Edward J. Tredinnick on behalf of Creditor Claimant No. 638
etredinnick@foxrothschild.com

Miranda Turner on behalf of Interested Party Century Indemnity Company
mturner@plevinturner.com

Joshua D Weinberg on behalf of Interested Party First State Insurance Company
jweinberg@rugerilaw.com

Matthew Michael Weiss on behalf of Interested Party Appalachian Insurance Company
mweiss@phrd.com

Harris Winsberg on behalf of Interested Party Appalachian Insurance Company
hwinsberg@phrd.com

Yongli Yang on behalf of Interested Party Certain Underwriters at Lloyds London and Certain London Market Companies
yongli.yang@clydeco.us

LIMITED SERVICE LIST

Description	Name	Address	Fax	Email
*NOA - Request for Notice	A.S.	Kim Dougherty, Esq. Just Law Collaborative 210 Washington St N Easton, MA 02356	385-278-0287	kim@justicelc.com
Debtor's Counsel, Registered ECF User	Amanda L. Cottrell			acottrell@sheppardmullin.com JHerschap@sheppardmullin.com
*NOA Counsel for Junipero Serra High School/Counsel for Marin Catholic High School/Counsel for Riordan High School/Counsel for Salesian Society, Registered ECF User	Binder & Malter, LLP	Robert G Harris 2775 Park Ave Santa Clara, CA 95050		rob@bindermalter.com robertw@bindermalter.com
Registered ECF User	Burns Bair LLP	Jesse Bair Timothy Burns Brian P Cawley		jbair@burnsbair.com kdempski@burnsbair.com tburns@burnsbair.com bcawley@burnsbair.com
*NOA - Request for Notice	C.B.	Kim Dougherty, Esq. Just Law Collaborative 210 Washington St N Easton, MA 02356	385-278-0287	kim@justicelc.com
Corresponding State Agencies	California Department of Tax And Fee Admin	P.O. Box 942879 Sacramento, CA 94279		
The Office of the California Attorney General	California Office of the Attorney General	1300 I St, Ste 1142 Sacramento, CA 95814		
Registered ECF User on behalf of Creditor Victoria Castro	Cheryl C. Rouse	Annette Rolain		rblaw@ix.netcom.com
*NOA - Counsel for Century Indemnity Company, Pacific Indemnity Company, and Westchester Fire Insurance Company	Clyde & Co US LLP	Alexander Potente Jason J Chorley 150 California St, 15th Fl San Francisco, CA 94111	415-365-9801	alex.potente@clydeco.us jason.chorley@clydeco.us
*NOA - Counsel for Certain Underwriters at Lloyd's, London and Certain London Market Companies, Registered ECF User	Clyde & Co US LLP	Catalina J Sugayan 30 S Wacker Dr, Ste 2600 Chicago, IL 60606	312-635-6917	Catalina.Sugayan@clydeco.us
Registered ECF User on behalf of Interested Party Certain Underwriters at Lloyds London and Certain London Market Companies	Clyde & Co US LLP	Nancy Lima Yongli Yang Jason J Chorley Daniel James Michael Norton		Nancy.Lima@clydeco.us yongli.yang@clydeco.us jason.chorley@clydeco.us Robert.willis@clydeco.us daniel.james@clydeco.us michael.norton@clydeco.us
Corresponding State Agencies	Colorado Department of Revenue	1881 Pierce St Lakewood, CO 80214		
*NOA - Attorneys for Companhia De Seguros Fidelidade SA (fka Fidelidade Insurance Company of Lisbon)	Cozen O'Connor	Mary P. McCurdy 388 Market St, Ste 1000 San Francisco, CA 94111		MMCurdy@cozen.com
*NOA - Counsel for Westport Insurance Corporation, formerly known as Employers Reinsurance Corporation	Craig & Winkelmann LLP	Robin D Craig 2001 Addison St, Ste 300 Berkeley, CA 94704		rcraig@craig-winkelmann.com
*NOA - Request for Notice	D.R.	Kim Dougherty, Esq. Just Law Collaborative 210 Washington St N Easton, MA 02356	385-278-0287	kim@justicelc.com
Registered ECF User on behalf of Interested Party Daughters of Charity Foundation	David S. Kupetz			david.kupetz@troutman.com

Registered ECF User on behalf of St. Paul Fire and Marine Insurance Co.	Dentons US LLP	Joshua Haevernick 1999 Harrison St, Ste 1300 Oakland, CA 94612	415-882-0300	joshua.haevernick@dentons.com
Registered ECF User on behalf of Appalachian Insurance Company	Dentons US LLP	Patrick C Maxcy John Grossbart 233 S Wacker Dr, Ste 5900 Chicago, IL 60606	312-876-7934	patrick.maxcy@dentons.com john.grossbart@dentons.com
Registered ECF User	Dentons US LLP			docket.general.lit.chi@dentons.com patrick.maxcy@dentons.com
Registered ECF User	Dentons US LLP	M. Keith Moskowitz		keith.moskowitz@dentons.com
Registered ECF User	Devin Miles Storey			dms@zalkin.com
*NOA - Counsel for The Archdiocese of San Francisco Capital Assets Support Corporation, Registered ECF User	Diamond McCarthy LLP	Allan Diamond Christopher Johnson 909 Fannin, Ste 3700 Houston, TX 77010	713-333-5199	chris.johnson@diamondmccarthy.com adiamond@diamondmccarthy.com
*NOA - Counsel for The Archdiocese of San Francisco Capital Assets Support Corporation	Diamond McCarthy LLP	Damion D D Robinson 355 S Grand Ave, Ste 2450 Los Angeles, CA 90071		damion.robinson@diamondmccarthy.com
*NOA - Counsel for Certain Underwriters at Lloyd's, London and Certain London Market Companies	Duane Morris LLP	Russell W Roten Andrew Mina Betty Luu 865 S Figueroa St, Ste 3100 Los Angeles, CA 90017-5450	213-689-7401	AMina@duanemorris.com BLuu@duanemorris.com
Registered ECF User on behalf of Interested Party Certain Underwriters at Lloyds London and Certain London Market Companies	Duane Morris LLP	Andrew Mina Betty Luu		Amina@duanemorris.com BLuu@duanemorris.com
Registered ECF User	Edward J. Tredinnick			etredinnick@foxrothschild.com
*NOA - Other Professional, Registered ECF User	Embolden Law PC	Douglas B Provencher 823 Sonoma Ave Santa Rosa, CA 95404-4714	707-284-2387	dbp@provlaw.com
Corresponding State Agencies	Employment Development Department	P.O. Box 989061 West Sacramento, CA 95798		
*NOA - Counsel for Abuse Claimant	Estey & Bomberger, LLP	Stephen Estey 2869 India St San Diego, CA 92103	619-295-0172	steve@estey-bomberger.com
Debtors' Counsel	Felderstein Fitzgerald Willoughby Pascuzzi & Rios LLP	Paul Pascuzzi Thomas Phinney Jason Rios 500 Capitol Mall, Ste 2250 Sacramento, CA 95814		ppascuzzi@ffwplaw.com tphinney@ffwplaw.com jrios@ffwplaw.com docket@ffwplaw.com
Debtors' Counsel, Registered ECF User	Felderstein Fitzgerald Willoughby Pascuzzi & Rios LLP	Paul Pascuzzi Jason Rios		ppascuzzi@ffwplaw.com jrios@ffwplaw.com docket@ffwplaw.com
*NOA - Request for Notice	Fiore Achermann	Sophia Achermann 605 Market St, Ste 1103 San Francisco, CA 94105	415-550-0605	sophia@theFAfirm.com
Corresponding State Agencies	Florida Department of Revenue	5050 W Tennessee St Tallahassee, FL 32399		
Fee Examiner	Frejka PLLC	Elise S. Frejka		Efrejka@frejka.com
*NOA - Request for Notice	GDR Group, Inc	Robert R Redwitz 3 Park Plz, Ste 1700 Irvine, CA 92614		randy@gdrgroup.com
Corresponding State Agencies	Georgia Department of Revenue Processing Center	P.O. Box 740397 Atlanta, GA 30374		

*NOA - Request for Notice	H.F.	Kim Dougherty, Esq. Just Law Collaborative 210 Washington St N Easton, MA 02356	385-278-0287	kim@justicelc.com
*NOA - Counsel for Century Indemnity Company, Pacific Indemnity Company, and Westchester Fire Insurance Company, Registered ECF User	Ifrah PLLC	George Calhoun 1717 Pennsylvania Ave, NW, Ste 650 Washington DC 20006		george@ifrahlaw.com
Internal Revenue Service	Internal Revenue Service	Centralized Insolvency Operation P.O. Box 7346 Philadelphia, PA 19101-7346		
*NOA - Request for Notice	J.B.	Kim Dougherty, Esq. Just Law Collaborative 210 Washington St N Easton, MA 02356	385-278-0287	kim@justicelc.com
*NOA - Request for Notice	J.D.	Kim Dougherty, Esq. Just Law Collaborative 210 Washington St N Easton, MA 02356	385-278-0287	kim@justicelc.com
Registered ECF User on behalf of Creditor City National Bank	Jennifer Witherell Crastz			jcratz@hemar-rousso.com
Registered ECF User on behalf of Interested Party Parishes of the Roman Catholic Archdiocese of San Francisco	Kathleen Mary Derrig Rios			kderrig@lewisroca.com
Registered ECF Party on behalf of Parishes of the Roman Catholic Archdiocese of San Francisco	Kathleen Mary Derrig Rios			Katie.Rios@wbd-us.com
*NOA - Claims Representative for the County of Kern	Kern County Treasurer and Tax Collector Office	Bankruptcy Division P.O. Box 579 Bakersfield, CA 93302-0579		bankruptcy@kerncounty.com
*NOA - Counsel for Parishes of the Roman Catholic Archdiocese of San Francisco, and The Archdiocese of San Francisco Parish and School Juridic Persons Real Property Support Corporation, Registered ECF User	Lewis Roca Rothgerber Christie LLP	One S Church Ave, Ste 2000 Tucson, AZ 85701-1666	520-622-3088	RCharles@lewisroca.com
*NOA - Counsel for Daughters of Charity Foundation; Registered ECF User	Locke Lord LLP	David S Kupetz 300 S Grand Ave, Ste 2600 Los Angeles, CA 90071		david.kupetz@lockelord.com Mylene.Ruiz@lockelord.com
Registered ECF User on behalf of Interested Party Companhia DeSeguros Fidelidade SA	Luke N. Eaton			lukeeaton@cozen.com monugiac@pepperlaw.com
Registered ECF User	Mary Alexander			malalexander@maryalexanderlaw.com
*NOA - Counsel for The Roman Catholic Bishop of Fresno, Registered ECF User	McCormick, Barstow, Sheppard, Wayte & Carruth LLP	Hagop T Bedoyan 7647 N Fresno St Fresno, CA 93720		hagop.bedoyan@mccormickbarstow.com ecf@kleinlaw.com
*NOA - Counsel to Sacred Heart Cathedral Preparatory (SHCP)	McDermott Will & Emery LLP	Carole Wurzelbacher 444 West Lake St, Ste 4000 Chicago, IL 60606	312-984-7700	cwurzelbacher@mwe.com
*NOA - Counsel to Sacred Heart Cathedral Preparatory (SHCP)	McDermott Will & Emery LLP	Darren Azman Lisa A. Linsky Natalie Rowles Cris W. Ray One Vanderbilt Ave New York, NY 10017-3852	212-547-5444	dazman@mwe.com llinsky@mwe.com nrowles@mwe.com cray@mwe.com
*NOA - Counsel to Sacred Heart Cathedral Preparatory (SHCP); Registered ECF User	McDermott Will & Emery LLP	Jason D. Strabo 2049 Century Park E, Ste 3200 Los Angeles, CA 90067-3206	310-277-4730	jstrabo@mwe.com
Registered ECF Party on behalf of Interested Party Sacred Heart Cathedral Preparatory	McDermott Will & Emery LLP	Darren Azman		dazman@mwe.com mco@mwe.com dnorthrop@mwe.com

Registered ECF User	Michele Nicole Detherage			mdetherage@robinskaplan.com
Corresponding State Agencies	New Mexico Taxation and Revenue Department	P.O. Box 25127 Santa Fe, NM 87504		
*NOA - Counsel for Chicago Insurance Company and Fireman's Fund Insurance Company	Nicolaides Fink Thorpe Michaelides Sullivan LLP	Matthew C Lovell 101 Montgomery St, Ste 2300 San Francisco, CA 94104		mlovell@nicolaidesllp.com
*NOA - Counsel for The Roman Catholic Seminary of San Francisco aka St. Patrick's Seminary & University	Niesar & Vestal LLP	Peter C Califano 90 New Montgomery St 9th Fl San Francisco, CA 94105		pcalifano@nvlawllp.com
Registered ECF User	Office of the U.S. Trustee / SF	Christina Lauren Goebelmann		christina.goebelmann@usdoj.gov USTPRegion17.SF.ECF@usdoj.gov
U.S. Trustee, Registered ECF User	Office of the United States Trustee	Phillip J. Shine 450 Golden Gate Ave, Rm 05-0153 San Francisco, CA 94102		phillip.shine@usdoj.gov
U.S. Trustee, Registered ECF User	Office of the United States Trustee	Jason Blumberg Trevor R Fehr Jared A. Day 501 I Street, Ste 7-500 Sacramento, CA 95814		jason.blumberg@usdoj.gov Trevor.Fehr@usdoj.gov jared.a.day@usdoj.gov USTP.Region17@usdoj.gov
U.S. Trustee, Registered ECF User	Office of the United States Trustee	Deanna K. Hazelton 2500 Tulare St, Ste 1401 Fresno, CA 93721		deanna.k.hazelton@usdoj.gov
*NOA - Proposed Counsel for the Official Committee of the Unsecured Creditors, Registered ECF User	Pachulski Stang Ziehl & Jones LLP	Brittany M Michael 780 3rd Ave, 34th Fl New York, NY 10017-2024	212-561-7777	bmichael@pszjlaw.com
*NOA - Proposed Counsel for the Official Committee of the Unsecured Creditors, Registered ECF User	Pachulski Stang Ziehl & Jones LLP	James I Stang 10100 Santa Monica Blvd, 13th Fl. Los Angeles, CA 90067		jstang@pszjlaw.com
*NOA - Proposed Counsel for the Official Committee of the Unsecured Creditors, Registered ECF User	Pachulski Stang Ziehl & Jones LLP	Debra I Grassgreen John W Lucas 1 Sansome St, 34th Fl, Ste 3430 San Francisco, CA 94104-4436		dgrassgreen@pszjlaw.com jlucas@pszjlaw.com
Registered ECF User on behalf of Creditor Committee The Official Committee of Unsecured Creditors	Pachulski Stang Ziehl & Jones LLP	Debra I. Grassgreen Gillian Nicole Brown		dgrassgreen@pszjlaw.com hphan@pszjlaw.com ocarpio@pszjlaw.com gbrown@pszjlaw.com ggreenwood@pszjlaw.com trosales@pszjlaw.com
*NOA - Counsel for Westport Insurance Corporation, formerly known as Employers Reinsurance Corporation, Counsel for Chicago Insurance Company and Fireman's Fund Insurance Company, Registered ECF User	Parker, Hudson, Rainer & Dobbs LLP	Todd C Jacobs John E Bucheit 2 N Riverside Plz, Ste 1850 Chicago, IL 60606	404-522-8409	tjacobs@phrd.com jbucheit@phrd.com
*NOA - Counsel for Westport Insurance Corporation, formerly known as Employers Reinsurance Corporation, Counsel for Chicago Insurance Company and Fireman's Fund Insurance Company, Counsel for Appalachian Insurance Company, Registered ECF User	Parker, Hudson, Rainer & Dobbs LLP	Harris B Winsberg Matthew M Weiss R David Gallo 303 Peachtree St NE, Ste 3600 Atlanta, Georgia 30308	404-522-8409	hwinsberg@phrd.com mweiss@phrd.com dgallo@phrd.com
*NOA - Counsel for Westport Insurance Corporation, formerly known as Employers Reinsurance Corporation, Counsel for Chicago Insurance Company and Fireman's Fund Insurance Company, Counsel for Appalachian Insurance Company Registered ECF User	Parker, Hudson, Rainer & Dobbs LLP	Matthew G Roberts 303 Peachtree St NE, Ste 3600 Atlanta, Georgia 30308	404-522-8409	mroberts@phrd.com
*NOA - Counsel for Century Indemnity Company, Continental Casualty Company, Registered ECF User	Plevin & Turner LLP	Mark D. Plevin 580 California St, 12th Fl San Francisco, CA 94104	415-986-2827	mplevin@plevinturner.com mark-plevin-crowell-moring-8073@ecf.pacerpro.com

*NOA - Counsel for Century Indemnity Company, Registered ECF User	Plevin & Turner LLP	Miranda H Turner/Jordan A Hess 1701 Pennsylvania Ave, NW, Ste 200 Washington, D.C. 20004		mturner@plevinturner.com jhess@plevinturner.com
*NOA - Request for Notice	R.C.	Kim Dougherty, Esq. Just Law Collaborative 210 Washington St N Easton, MA 02356	385-278-0287	kim@justicelc.com
*NOA - Request for Notice	R.F.	Kim Dougherty, Esq. Just Law Collaborative 210 Washington St N Easton, MA 02356	385-278-0287	kim@justicelc.com
*NOA - Request for Notice	R.F. Jr.	Kim Dougherty, Esq. Just Law Collaborative 210 Washington St N Easton, MA 02356	385-278-0287	kim@justicelc.com
*NOA - Request for Notice	R.M.	Jeannette A. Vaccaro, Esq. 315 St., 10th Fl San Francisco, CA 94104	415-366-3237	jv@jvlaw.com
Registered ECF User on behalf of Creditor Shajana Steele	Robert J. Pfister			rpfister@pslawllp.com
Registered ECF User on behalf of Interested Party Parishes of the Roman Catholic Archdiocese of San Francisco	Robert M Charles, Jr			Robert.Charles@wbd-us.com
*NOA - Counsel for Appalachian Insurance Company	Robins Kaplan LLP	Christina M. Lincoln 2121 Ave of the Stars, Ste 2800 Los Angeles, CA 90067	310-229-5800	clincoln@robinskapan.com LCastiglioni@robinskapan.com
*NOA - Counsel for Appalachian Insurance Company	Robins Kaplan LLP	Melissa M D'Alelio Taylore E Karpa Schollard 800 Boylston St, Ste 2500 Boston, MA 02199	617-267-8288	mdalelio@robinskapan.com tkarpa@robinskapan.com
*NOA - Counsel for Interested Party First State Insurance Company, Registered ECF User	Ruggeri Parks Weinberg LLP	Annette P Rolain Joshua Weinberg 1875 K St NW, Ste 600 Washington, DC 20006-1251		Arolain@rugerilaw.com jweinberg@rugerilaw.com bkfilings@rugerilaw.com
Corresponding State Agencies	San Francisco County Clerk	I Dr Carlton B Goollett Pl City Hall, Room 168 San Francisco, CA 94102		
Corresponding State Agencies	San Francisco Tax Collector	c/o Secured Property Tax P.O. Box 7426 San Francisco, CA 94120		
Corresponding State Agencies	San Mateo County Tax Collector	555 County Center, 1st Floor Redwood City, CA 94063		
Debtor's Counsel, Registered ECF User	Sheppard, Mullin, Richter & Hampton LLP	Ori Katz Alan H Martin 4 Embarcadero Ctr, 17th Fl San Francisco, CA 94111-4109		amartin@sheppardmullin.com okatz@sheppardmullin.com
Debtor's Counsel, Registered ECF User	Sheppard, Mullin, Richter & Hampton LLP	Jeannie Kim Ori Katz		jekim@sheppardmullin.com dgatmen@sheppardmullin.com okatz@sheppardmullin.com LSegura@sheppardmullin.com lwidawskeibovici@sheppardmullin.com
Registered ECF User on behalf of Interested Party Century Indemnity Company	Simpson Thacher & Bartlett LLP	David Elbaum Pierce MacConaghy		david.elbaum@stblaw.com janie.franklin@stblaw.com pierce.macconaghy@stblaw.com
*NOA - Counsel for Westport Insurance Corporation, formerly known as Employers Reinsurance Corporation, Registered ECF User	Sinnott, Puebla, Campagne & Curet, APLC	Blaise S Curet 2000 Powell St, Ste 830 Emeryville, CA 94608	415-352-6224	bcuret@spclaw.com

*NOA - Counsel for Certain Underwriters at Lloyd's, London and Certain London Market Companies	Skarzynski Marick & Black LLP	Jeff D Kahane/Timothy W Evanston Nathan Reinhardt/Russell W Roten 663 W 5th St, 26th Fl Los Angeles, CA 90071		jkahane@skarzynski.com tevanston@skarzynski.com nreinhardt@skarzynski.com rrotten@skarzynski.com
*NOA - Counsel for Interested Party First State Insurance Company , Registered ECF User	Smith Ellison	Michael W Ellison 2151 Michelson Dr, Ste 185 Irvine, CA 92612	949-442-1515	mellison@sehlaw.com kfoster@sehlaw.com
Corresponding State Agencies	State of California Franchise Tax Board	P.O. Box 942867 Sacramento, CA 94267		
Debtor	The Roman Catholic Archbishop of San Francisco	One Peter Yorke Way San Francisco, CA 94109		
Corresponding State Agencies	Virginia Department of Taxation	P.O. Box 1115 Richmond, VA 23218		
Corresponding State Agencies	Virginia Employment Commission	P.O. Box 26441 Richmond, VA 23261		